BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON D.C. 20554

In the matter of:	)	
	)	1800B3-TSN
FCC's determination to terminate	)	Media Bureau/Audio Division
WAPA-AM/WA2XPA-AM	)	
EXPERIMENTAL BOOSTERS OPERATION	)	
March 13, 2017		

REQUEST TO REINSTATE WAPA-AM LICENSE TO PARAMETERS EXISTING JUST BEFORE FCC GRANTED the ORIGINAL LICENSE to WA2XPA in 08/09/2002 DUE TO FCC's ORDER TO TERMINATE the EXPERIMENTAL OPERATION

Wifredo G. Blanco-Pi, licensee of WAPA-AM and WA2XPA-AM requests the Federal Communication Commission to reinstate WAPA's operating parameters as licensed just before the grant of WA2XPA-AM original construction permit 08/09/2002.

Blanco-Pi seeks the FCC to reinstall WAPA-AM to licensed parameters as of BL-19920210AA. By that time WAPA operated non directional fulltime with 10kw/day and 9.5 kw/night. **WAPA-AM was applied the ratchet rule TWO times to allow WA2XPA to operate with 0.4 KW at night (BP-20021106AAQ) and to increase WA2XPA nighttime power to 0.57 KW (BP-20090710ASD).**

Since it is FCC's decision, (not the licensee's decision) to terminate WAPA/WA2XPA synchronous booster experiment WAPA shall be entitled to operate back with 9.5KW nighttime non-directional as it did back in 1992. The only reason for the installation of a directional antenna for nighttime operation at WAPA (2002) and for its modification later on (2009) was to operate WA2PA NIGHTIME.

The FCC in its letter dated Nov. 7/2016 (Ref: 1800B3-TSN) orders the licensee of WA2XPA-AM to terminate operations in six months (May 7, 2017) after having operated

uninterruptedly for 13 years. In its letter the FCC states that WA2XPA-AM and the other boosters operated by Blanco-Pi (WI2XSO-AM for 17 years and WI3XSO-AM for 14 years) were supposed to be experiments not to last over five years.

As can be observed the FCC not only licensed WA2XPA-AM in 2002 but allowed the licensee to initiate nightime operation at WA2XPA-AM in 2003 with 0.4 Kw, and increase nightime power to 0.57kw in 2010 granting contingent applications to install a directional antenna for nightime operation at WAPA in 2003 and to modify the directional antenna of WAPA 2010 in order to grant the WA2XPA-AM applications.

This can be verified at the engineering exhibits prepared for the respective applications:

From WAPA's Engineering Exhibit BP20021106AAQ GRANTED ON 7/29/2003.
FCC granted too on 7/29/2013 the contingent application WA2XPA BPEX-20021108ACX to operate WA2XPA nightime with 0.400 kw

"This engineering exhibit has been prepared on behalf of Wifredo G. Blanco-Pi, licensee of AM broadcast station WAPA San Juan, Puerto Rico. Station WAPA operates on 680 Khz. Employing a power of 10 kilowatts daytime and 9.5 kilowatts nightime, Facility ID 8889. The applicant proposes to increase power during nightime hours to 10 kilowatts, while employing a directional antenna. No changes are proposed in the non-directional daytime operation. ***The application is contingent upon the grant of a contemporaneously filed application seeking nightime operation for experimental synchronous operation WA2XPA, located at Arecibo, Puerto Rico."***

wg BP

From WA2XPA Engineering Exhibit BPEX-20091201ALI GRANTED ON 12/09/2010.

"This engineering exhibit has been prepared on behalf of Wifredo G. Blanco Pi, licensee of AM broadcast station WA2XPA Arecibo, Puerto Rico. Station WA2XPA operates on 680 kHz employing power of 0.4 kilowatts ND daytime and nighttime, Facility ID 128696. This applicant proposes to increase the nighttime power using the same antenna system. No changes are proposed for the daytime operation. ***This proposal is contingent upon the grant of the recently filed amendment application for construction permit to change the nighttime operation of WAPA at San Juan, PR (FCC File No. BP-20090710ASD)."***

As stated in the reconsideration filings made by Blanco-Pi to 1800B3-TSN Blanco-Pi and by Bestov Broadcaster (licensee of WI2XAC) the FCC never warned these licenses that the synchronous boosters granted were limited to a five year experimental period. The FCC allowed Blanco-Pi to install a directional antenna system at WAPA to grant nightime

operation to WA2XPA-AM (0.4 kw/ND, night) and to modify the directional antenna 6 (SIX) years after that to increase WA2XPA-AM to 0.57 kw/ND, night.

Blanco-Pi filed a reconsideration letter to 1800B3-TSN that has not been replied by the FCC and we are only two months away from the termination date of WA2XPA-AM's license. If the FCC insists in terminating the WAPA/WA2XPA SYNCHRONOUS BOOSTER operation the FCC should revert everything back to 08/09/2002 when it began granting multiple authorizations to WAPA/WA2XPA that implied serious monetary investment and large time and effort to implement the AM synchronous operations at both the booster and the main station.

The Media Bureau acted discriminatorily with the AM broadcaster that achieved success in his unique AM synchronous booster system (WA2XPA, WI2XSO, WI3XSO). In the case of WSTE-TV in Puerto Rico the Media Bureau not only granted a unique, experimental license permiting Channel 7 in Puerto Rico to rebroadcast its programming entirely. The Media Bureau granted a permanent license years after to Channel 7 to legalize permanently its experimental system in a unitary permanent license. I quote from the Public Notice published by the FCC on December, 2002:

WAPA

"In 1986, the Commission authorized the licensee of WSTE(TV) to construct an experimental broadcast facility in the Ponce, Puerto Rico area, in order to determine whether a system of multiple cochannel transmitters, simultaneously broadcasting,could provide better service in Puerto Rico's mountainous terrain than the authorized single transmitter. The design utilized an alternate transmitter and three television booster stations, operating at increased power, spaced throughout the island. In 1992, the Commission granted Siete Grande waivers of Sections 73.1675(a) and 74.735(d) of the Rules in order to permit operation of the multi-station facility on a regular basis. Siete Grande, 7 FCC Rcd 5299 (1992). Siete Grande now seeks a special "unitary" license which would cover the auxiliary and booster sites, in lieu of each site having a separate license. This new license would treat the multi-site transmission facility as a collective primary station for both NTSC and DTV licenses. The license would also eliminate the need for the licensee to maintain a separate main transmitter facility in Ponce, which currently must remain turned off to avoid interference with the array. Finally, the "unitary" license would give primary status to the currently secondary booster stations that are part of the multi-site facility." (Entire text of the FCC Public Notice concerning WSTE-TV is attached.)

WAPA/WA2XPA and WISO/WI2XSO/WI3XSO did nothing different from what WSTE-TV did, both in Puerto Rico. But WSTE-TV was awarded a unitary permanent license to the unique booster system and BLANCO-PI was condemned to shutdown all of his boosters, to sell the real state and the equipment as a flea market and condemned to operate the main station, WAPA with an unnecessary two tower directional antenna system.

If the FCC not only not only cancels the booster licenses but denies this request to operate WAPA with 10KW day/9.5KWN, NON-DIRECTIONAL **the FCC will condemn forever the licensee of WAPA to maintaining an unnecessary 6 acre plot of land, a unnecessary tower, unnecessary phasor, unnecessary beacon and sidelights and to keep a station that had 9.5kw non-directional at night with 10KW directional.**

Isn't it sufficient punishment to loose all the investment made in the booster to keep forever the economic burden of maintaining an unnecessary two tower directional antenna?

Respectfully, I request the FCC to waive the ratchet rule applications that were made to WAPA-AM on 2003 and 2010 that were associated with the AM synchronous booster experimentation and that the license granted on 1992 (BL-19920210AA) be reinstated at the same date the WA2XPA-AM is being cancelled, THAT is, MAY 07, 2017. That would permit WAPA-AM to continue operating 10KW/day ND, 9.5 KW/night ND.

If it was simply an experiment for the FCC and the FCC terminates the experiment give back WAPA-AM its non-directional operation just as it had before installing the synchronous booster. It is the fair thing to do.

RESPECTFULLY SUBMITTED:

Wifredo G Blanco P.

ENG. WIFREDO G. BLANCO-PI

Attachment: Public Notice FCC Dec/2002 re: WSTE-TV boosters in Puerto Rico

Filed at the Office of the Secretary, via Express Mail.
Emailed to Chairman Ajit Pai, Com. Mignon Clyburn, Com. Michael O'Rielly, Michelle Carey, Peter Doyle, Tom Hutton, James Bradshaw, Lisa Scanlan.
Ex parte comment file at RM-11779 Rulemaking file.